



0053597

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

August 21, 2000

Mr. Steven H. Wisness, Director
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. Roby D. Enge, Director
Environment, Safety, and Health
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-75
Richland, Washington 99352

Mr. Richard H. Gurske, Project Manager
Environmental Services
Fluor Hanford
P.O. Box 1000, MSIN: H8-73
Richland, Washington 99352

RECEIVED
AUG 24 2000
EDMC

Dear Messrs. Wisness, Enge, and Gurske:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource Conservation & Recovery (RCRA) Permit, Dangerous Waste Portion (Quarter Ending June 30, 2000 - Condition I.C.3)

Enclosed are the Modification Notification Forms indicating those modifications that the Washington State Department of Ecology (Ecology) has reviewed and approved for the referenced quarterly Class 1 Modifications.

These quarterly Class 1 Modifications include:

- Part III, Chapter 2 (305-B Storage Facility)
 - Building Emergency Procedure (Chapter 7)
- Part III, Chapter 6 (325 Hazardous Waste Treatment Units)
 - Part A, Form 3
 - Contingency Plan (Chapter 7 and Appendix 7A)

Messrs. Wisness, Enge, and Gurske

August 21, 2000

Page 2

The following proposed Class 1 Modifications were not approved:

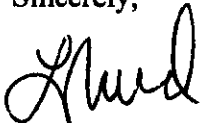
- Part III, Chapter 6 (325 Hazardous Waste Treatment Units)
 - Chapters 2, 4, 6, and 11

These modification requests are being rejected because the proposed modifications were not identified. The United States Department of Energy (USDOE)/contractors submitted complete revisions of these four (4) chapters without any redline-strikeout to indicate the proposed modifications. Please resubmit these chapters with the modifications clearly identified.

Ecology has not completed review of the proposed modifications to Part III, Chapter 4 (Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility) regarding groundwater monitoring. These will be forwarded to you as soon as our review is complete.

USDOE and contractor staff are encouraged to discuss proposed Class 1 changes with Ecology's Unit Managers during the quarter to clarify any questions and/or concerns. If you have any questions or comments regarding this letter, please do not hesitate to contact me at (509) 736-5715.

Sincerely,



Laura Ruud, Permitting Specialist
Nuclear Waste Program

LR:sb

Enclosure

cc w/enc.: Ellen Mattlin, USDOE
Lorna Dittmer, BHI
Suzette Thompson, FH
Alice Ikenberry, PNNL
J.R. Wilkinson, CTUIR
Donna Powaukee, NPT
Russell Jim, YIN
Administrative Record: Site-Wide Permit

cc w/o enc.: Clifford Clark, USDOE
Sue Price, FH
Mary Lou Blazek, OOE

Hanford Facility RCRA Permit Modification Notification Form

Unit: 305-B Storage Facility	Permit Part & Chapter: Part III, Chapter 2 and Attachment 18								
Description of Modification: Chapter 7 Remove Chapter 7 and replace with the attached Chapter 7.									
Modification Class: ¹²³ Please check one of the Classes:	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Class 1</td> <td style="width: 25%;">Class¹1</td> <td style="width: 25%;">Class 2</td> <td style="width: 25%;">Class 3</td> </tr> <tr> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> </tr> </table>	Class 1	Class ¹ 1	Class 2	Class 3	X			
Class 1	Class ¹ 1	Class 2	Class 3						
X									
Relevant WAC 173-303-830, Appendix I Modification: A.1.									
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u> A. General Permit Provisions: 1. Administrative and informational changes.									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;"> Submitted by Co-Operator: <i>A.K. Ikenberry</i> 6/23/00 A.K. Ikenberry Date </td> <td style="width: 25%;"> Reviewed by RL Program Office: <i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date </td> <td style="width: 25%;"> Reviewed by Ecology: <i>J.J. Wallace</i> 7/24/00 J.J. Wallace Date </td> <td style="width: 25%;"> Reviewed by Ecology: <i>L.E. Ruud</i> 8/18/00 L.E. Ruud Date </td> </tr> </table>		Submitted by Co-Operator: <i>A.K. Ikenberry</i> 6/23/00 A.K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date	Reviewed by Ecology: <i>J.J. Wallace</i> 7/24/00 J.J. Wallace Date	Reviewed by Ecology: <i>L.E. Ruud</i> 8/18/00 L.E. Ruud Date				
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¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36										
Description of Modification: Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system. Replace Chapter 1.0 with attached Chapter 1.0.											
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Modification Class: ^{12,3}</td> <td style="width: 12.5%; text-align: center;">Class 1</td> <td style="width: 12.5%; text-align: center;">Class¹1</td> <td style="width: 12.5%; text-align: center;">Class 2</td> <td style="width: 12.5%; text-align: center;">Class 3</td> </tr> <tr> <td>Please check one of the Classes:</td> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> </tr> </table>		Modification Class: ^{12,3}	Class 1	Class ¹ 1	Class 2	Class 3	Please check one of the Classes:	X			
Modification Class: ^{12,3}	Class 1	Class ¹ 1	Class 2	Class 3							
Please check one of the Classes:	X										
Relevant WAC 173-303-830, Appendix I Modification: A.1.											
Enter wording of the modification from WAC 173-303-830, Appendix I citation A. General Permit Provisions 1. Administrative and Informational changes.											
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¹Class 1 modifications requiring prior Agency approval.

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³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Units

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36

Description of Modification:

Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system.

Section III.C.

S01, T04, S02, T01

The 325 Hazardous Waste Treatment Units (325 HWTUs) consist of the Shielded Analytical Laboratory (SAL) which includes Rooms 32, 200, 201, 202, and 203; the Hazardous Waste Treatment Unit (HWTU) encompassing Rooms 520 and 528 of the 325 Building, and the 325 Collection/Loadout Station Tank located in the southeast corner of the basement of the 325 Building. The 325 HWTUs began waste management operations in 1991 (SAL) and 1995 (HWTU). Up to 10,000 liters of dangerous and/or mixed waste may be stored in containers in the 325 HWTUs (S01). A maximum of 1514 liters of dangerous and/or mixed waste may be treated per day in containers in the 325 HWTUs (T04).

Liquid dangerous and/or mixed waste is transferred to tank storage via gravity drain lines located in the SAL (which drain into tank TK-1) and in Room 528 [which drain directly to the radioactive liquid waste system (RLWS)]. Tank TK-1 is drained via a jet system into the RLWS. The Collection/Loadout Station Tank will be utilized to collect liquid dangerous and/or mixed waste after the RLWS is closed, and will be connected to existing drain lines. This tank will transfer collected liquid dangerous and/or mixed waste to a loadout station, where mobile containers will be loaded to transfer the liquid dangerous and/or mixed waste to the Double-Shell Tank System. A maximum of 12,574 liters of dangerous and/or mixed waste may be stored in tanks in the 325 HWTUs (S02). A maximum of 12,574 liters of dangerous and/or mixed waste may be treated in tanks per day in the 325 HWTUs (T01).

Dangerous and/or mixed waste treatments are generally conducted as small bench-scale operations except for in-tank treatments. Treatment processes utilized at the 325 HWTUs may include the following:

T11 Molten salt destructor	T35 Centrifugation	T55 Electrodialysis
T12 Pyrolysis	T36 Clarification	T56 Electrolysis
T13 Wet air oxidation	T37 Coagulation	T57 Evaporation
T14 Calcination	T38 Decanting	T58 High gradient magnetic separation
T15 Microwave discharge	T39 Encapsulation	T59 Leaching
T18 Other thermal treatment	T40 Filtration	T60 Liquid ion exchange
T21 Chemical fixation	T41 Flocculation	T61 Liquid-liquid extraction
T22 Chemical oxidation	T42 Flotation	T62 Reverse osmosis
T23 Chemical precipitation	T43 Foaming	T63 Solvent recovery
T24 Chemical reduction	T44 Sedimentation	T64 Stripping
T25 Chlorination	T45 Thickening	T65 Sand filter
T26 Chlorinolysis	T46 Ultrafiltration	T66 Other removal technology
T27 Cyanide destruction	T47 Other separation technology	T67 Activated sludge
T28 Degradation	T48 Absorption-molecular sieve	T69 Aerobic tank
T29 Detoxification	T49 Activated carbon	T70 Anaerobic lagoon or tank
T30 Ion exchange	T50 Blending	T71 Composting
T31 Neutralization	T51 Catalysis	T74 Thickening filter
T32 Ozonation	T52 Crystallization	T75 Trickling filter
T33 Photolysis	T53 Dialysis	T77 Other biological treatment
T34 Other chemical treatment	T54 Distillation	

Modification Class: ^{1,2,3}	Class 1	Class 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 6/23/00	<i>R.F. Christensen</i> 6/29/00	<i>J. J. Wallace</i> 6/29/00	<i>L.E. Ruud</i> 8/18/00
A.K. Ikenberry Date	R.F. Christensen Date	J. J. Wallace Date	L.E. Ruud Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Units

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36

Description of Modification:

Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system.

Section IV. Description of Dangerous Waste: Corrected typographical error.

Line No.	A. Dangerous Waste No. (enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)			D. Processes					
									1. Process Codes (enter)			2. Process Description (if a code is not entered in D(1))		
485	W	T	0	1		↓			↓	↓			↓	
486	W	T	0	1		↓			↓	↓			↓	

Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 6/23/00 A.K. Ikenberry Date	<i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date	<i>J.J. Wallace</i> 8/18/00 J.J. Wallace Date	<i>L.E. Ruud</i> 8/18/00 L.E. Ruud Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36								
Description of Modification: Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system.									
Section IX.: Modified Date Signed block as follows: <div style="background-color: black; width: 100px; height: 15px; margin: 5px 0;"></div> 00/30/1997									
Section X: Modified Date block as follows: Date <div style="background-color: black; width: 100px; height: 15px; display: inline-block;"></div>									
Modification Class: ¹²³	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Class 1</td> <td style="width: 25%; text-align: center;">Class¹ 1</td> <td style="width: 25%; text-align: center;">Class 2</td> <td style="width: 25%; text-align: center;">Class 3</td> </tr> <tr> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> </tr> </table>	Class 1	Class ¹ 1	Class 2	Class 3	X			
Class 1	Class ¹ 1	Class 2	Class 3						
X									
Please check one of the Classes:									
Relevant WAC 173-303-830, Appendix I Modification: A.1.									
Enter wording of the modification from WAC 173-303-830, Appendix I citation									
A. General Permit Provisions									
1. Administrative and Informational changes.									
Submitted by Co-Operator: <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> A.K. Ikenberry </div> <div style="width: 45%;"> <div style="text-align: right;">6/23/00</div> <div style="text-align: center;">Date</div> </div> </div>	Reviewed by RL Program Office: <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> R.F. Christensen </div> <div style="width: 45%;"> <div style="text-align: right;">6/29/00</div> <div style="text-align: center;">Date</div> </div> </div>								
Reviewed by Ecology: <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> J.J. Wallace </div> <div style="width: 45%;"> <div style="text-align: right;">8/18/00</div> <div style="text-align: center;">Date</div> </div> </div>	Reviewed by Ecology: <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> L.E. Ruud </div> <div style="width: 45%;"> <div style="text-align: right;">8/18/00</div> <div style="text-align: center;">Date</div> </div> </div>								

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
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Description of Modification:

Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system.

Figure 1: Redrawn and identification number for figure updated.

Figure 2: Redrawn and identification number for figure updated. Modified title as follows:
325 Hazardous Waste Treatment Unit

Figure 3: Revised to denote RPS and RLWS and identification number for figure updated. Modified title as follows:
Location of Shielded Analytical Laboratory Tank in Room 32 and ~~Proposed~~ Location of 325 Collection/Loadout Station Tank (basement) of the 325 Building.

Figure 5: Modified title as follows:
~~Proposed~~ 325 Collection/Loadout Station Tank.

Modification Class: ¹²³	Class 1	Class¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions**1. Administrative and Informational changes.**

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 4/23/00 A.K. Ikenberry Date	<i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date	<i>J.J. Wallace</i> 8/18/00 J.J. Wallace Date	<i>L.E. Ruud</i> 8/18/00 L.E. Ruud Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
Description of Modification: Part A, Form 3: Replace the Part A, Form 3, Revision 4 with the attached Part A, Form 3, Revision 4A. The Part A, Form 3, was modified to reflect the installation of the Radioactive Liquid Waste Tank system.	
Photograph 1: Modified titles as follows: Hazardous Waste Treatment Unit	
Photograph 2: Modified titles as follows: Hazardous Waste Treatment Unit	
Photograph 3: Modified titles as follows: Hazardous Waste Treatment Unit	
Photograph 6: Corrected identification number for photograph.	
Photograph 8: Corrected the photo taken date as follows: (Photo Taken 1979-)	
Photograph 9: Replaced photograph with current photograph of installed RLWT. Modified title as follows:: Proposed 325 Collection/Loadout Station Tank	
Modification Class: ^{1,2}	
Please check one of the Classes:	Class 1 <input checked="" type="checkbox"/> X
Relevant WAC 173-303-830, Appendix I Modification: A.1.	
Enter wording of the modification from WAC 173-303-830, Appendix I citation	
A. General Permit Provisions	
1. Administrative and Informational changes.	
Submitted by Co-Operator: <i>A.K. Ikenberry</i> 6/29/00 A.K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date
Reviewed by Ecology: <i>J.J. Wallace</i> 8/10/00 J.J. Wallace Date	Reviewed by Ecology: <i>E.E. Ruud</i> 8/10/00 E.E. Ruud Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Units

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36

Description of Modification:

Chapter 7:

Replace Chapter 7 with the attached Chapter 7.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 4/23/00 A.K. Ikenberry Date	<i>R.F. Christensen</i> 6/29/00 R.F. Christensen Date	<i>J. J. Wallace</i> 8/18/00 J. J. Wallace Date	<i>L.E. Ruud</i> 8/18/00 L.E. Ruud Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Units

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36

Description of Modification:

Appendix 7A:

Replace Appendix 7A with the attached Appendix 7A.

Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
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Hanford Facility RCRA Permit Modification Notification Form				
Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36			
<u>Description of Modification:</u> Chapters 2, 4, 6, and 11: Replace Chapters 2, 4, 6, and 11 with the attached Chapters 2, 4, 6, and 11. These Chapters were modified to reflect the installation of the Radioactive Liquid Waste Tank system.				
Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:	X			
Relevant WAC 173-303-830, Appendix I Modification: A.1.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>				
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